

1 ROBERT W. FREEMAN
Nevada Bar No. 3062
2 Robert.Freeman@lewisbrisbois.com
NOEL E. EIDSMORE
3 Nevada Bar No. 7688
Noel.Eidsmore@lewisbrisbois.com
4 CAYLA WITTY
Nevada Bar No. 12897
5 Cayla.Witty@lewisbrisbois.com
LEWIS BRISBOIS BISGAARD & SMITH LLP
6 6385 S. Rainbow Boulevard, Suite 600
Las Vegas, Nevada 89118
7 702.893.3383
FAX: 702.893.3789
8 Attorneys for Defendants
Las Vegas Metropolitan Police
9 Department, Detective Reggie Rader
and Lt. Bobby Smith

10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA, SOUTHERN DIVISION

12 ***

13 JAMES KIESSLING,
14 Plaintiff,
15 vs.

CASE NO. 2:16-cv-0690-GMN-NJK

**PROPOSED STIPULATION AND ORDER
TO EXTEND THE DEADLINES FOR
DISPOSITIVE MOTIONS**

FIRST REQUEST

16 DET. RADER P#6099, individually and as a
17 police officer employed by the Las Vegas
Metropolitan Police Department; LT. B.
18 SMITH, individually and as a police officer
employed by the Las Vegas Metropolitan
19 Police Department; and LAS VEGAS
METROPOLITAN POLICE
20 DEPARTMENT, a Political Subdivision of the
State of Nevada, inclusive,
21 Defendants.
22

23 Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of
24 record, hereby stipulate and request that this Court extend the deadline to file dispositive motions
25 in the above-captioned case thirty (30) days, up to and including June 1, 2017.

26 This Request for an extension of time is not sought for any improper purpose or other
27 purpose of delay. This request for extension is based upon the following:

28 ///

1 Counsel for Defendant has been in out of state depositions in other matters (and has more
2 scheduled) for part of April, and needs additional time to complete Defendant's motion for
3 summary judgment in this matter. The parties are also awaiting decisions regarding discovery
4 matters in this case.

5 Counsel for the parties have met and conferred on this topic and have agreed that, to best
6 serve the interests of the parties and obviate the potential for future motion practice, the most
7 efficient remedy is to reasonably extend the dispositive motion deadline for both parties.

8 WHEREFORE, the parties respectfully request that this Court extend the time for the
9 parties to file their dispositive motions by thirty (30) days from the current deadline of May 1,
10 2017 up to and including June 1, 2017.

11 DATED this 17th day of April, 2017.

DATED this 17th day of April, 2017.

12 LEWIS BRISBOIS BISGAARD
13 & SMITH

GENTILE CRISTALLI, MILLER
ARMENI, SAVARESE

14 /s/ Robert W. Freeman

/s/ Paola M. Armeni

15 Robert W. Freeman, Jr., Esq.
16 Nevada Bar No. 3062
17 Noel E. Eidsmore, Esq.
18 Nevada Bar No. 7688
19 Cayla Witty, Esq.
20 Nevada Bar No. 12897
21 6385 S. Rainbow Blvd., Suite 600
22 Las Vegas, Nevada 89118
23 *Attorneys for Defendants*

Paola M. Armeni, Esq.
Nevada Bar No. 8357
Kory L. Kaplan
Nevada Bar No. 13164
410 S. Rampart Blvd., Suite 420
Las Vegas, Nevada 89145
Attorneys for Plaintiff
James Kiessling

24 *Las Vegas Metropolitan Police Department,*
25 *Detective Reggie Rader*
26 *and Lt. Bobby Smith*

27 **ORDER**

28 IT IS SO ORDERED.

Dated April 17 _____, 2017.


United States Magistrate Judge